



MSPC Advisory Circular

ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF AIR PROGRAMS • MOBILE SOURCE POLLUTION CONTROL PROGRAM

A/C No. 19

October 16, 1972

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Subject: "Zero Miles" Definition

A. Purpose

The purpose of this Advisory Circular is to clarify the motor vehicle emission control regulations regarding the definition of "zero miles."

B. Background

1. The motor vehicle emission control regulations published on November 10, 1970, (35 F.R. 17228) and applicable to the 1972 model year, contained the following definition of "zero miles": "that point after initial engine starting (not to exceed 10 miles of vehicle operation) at which adjustments are completed."

2. For the 1973 model year, an interpretative statement concerning "zero miles" was included in the EPA letter which informed manufacturers of their 1973 certification testing and fleet requirements. In practice, however, confusion developed over the mileage accumulation during preconditioning for the official zero mile test. Because of the confusion over the "zero miles" definition, EPA has elected to publish this Advisory Circular to clarify this situation for 1974 model year certification.

C. Interpretation of "Zero Miles" Definition

1. 40 CFR 85.1(a)(28) means that durability and emission data vehicles shall have accumulated no more than ten miles at the beginning of the preconditioning for the first zero mile test [i.e., the certification vehicle, as described in the application for certification, may have accumulated approximately fifty miles (roughly 32 miles during the one hour of mileage accumulation as required by 40 CFR 85.73(a), 7.5 miles during the dynamometer portion of the preconditioning as required by 40 CFR 85.73(c), plus the maximum of 10 miles prior to the beginning of the preconditioning) when the first zero mile cold start dynamometer test begins].

2. A vehicle will be considered to be completed, and therefore subject to the requirement in paragraph C.1 above, when the test vehicle is assembled to be in all material respects the same as the vehicle described in the application for certification.

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